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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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TO: <i>Wade Hartwick</i>	TELEFAX #: <i>(312) 886-4071</i>
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FROM: <i>Gabrielle Hauer</i>	TELEPHONE: <i>(317) 243-SARE</i>
COMMISSION & SECTION:	NUMBER OF PAGES (INCLUDING COVER PAGE): <i>9</i>

DATE:
COMMENTS: <i>Comments for the ACS - SOW.</i> <i>Draft. The final will be on letter-head + single space.</i> <i>JP.</i>

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IDEM Stores and Mail (Basement)	(317) 232-5539	(317) 232-8568
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IDEM Air Management (2nd Floor)	(317) 233-3257	(317) 232-5586
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Drinking Water Branch (Jackson Square)	(317) 233-4165	(317) 233-4222
Northwest Regional Office (Gary, IN)	(219) 881-6745	(219) 881-6712
Water Management (6th floor)	(317) 232-8637	(317) 232-8683
Water Management (4th floor)	(317) 232-8406	(317) 232-8476

Mr. Wayde Hartwick HSRL-6J
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Dear Mr. Hartwick:

Re: Comments on the Statement of
Work (SOW) for the Remedial
Design/Remedial Action (RD/RA)
at the American Chemical
Services (ACS) Site, Lake
County, Griffith, Indiana

*The Indiana Department of Environmental Management (IDEM) reviewed
the above named document. Our review generated the following comments:*

1. Page 3, D.3., line 5:

After "U.S. EPA insert: and the State.

2. Page 4, line 1:

Shouldn't this sentence read: "... shall be levels that are
less or equal than ...?"

3. Page 4, paragraph 1:

It may be helpful to outline and justify how the cumulative
cancer risk of 1.3×10^{-5} for the ground water was derived.
(See also cumulative cancer risk in soil.)

4. Page 4, paragraph 2, sentence 1:

It may be helpful to add to this sentence that the ground
water performance standards will be calculated by EPA or

approved by EPA after consultation with the State.

5. Page 4, paragraph 4, line 3:

Add: "... performance standards as approved by EPA after consultation with the State, prior to discharge"

6. Page 4, paragraph 4, sentence 2:

This sentence should read: "... discharge of treated ground water into surface waters and wetlands."

7. Page 4, paragraph 5, line 2 and line 5:

Add in line 3 and line 5 after U.S. EPA: and the State.

8. Page 5, paragraph 2, line 10:

This sentence should read: "... U.S. EPA's approval of the petition, after consultation with the State, Settling Defendants"

9. Page 5, paragraph 3, line 3:

This sentence should read: "... , if U.S. EPA, after consultation with the State, determines"

10. Page 6, paragraph 3, line 3:

The cumulative cancer risk should be less or equal 3.3×10^{-5} . It may be helpful to outline how this cumulative cancer risk number for soil was derived.

11. Page 3, paragraph 3, line 10:

Add: "... U.S. EPA and the State upon request"

12. Page 8, paragraph 2, line 2, 5, 11, 15:

Add (4 times) in the above mentioned lines after U.S. EPA:
"after consultation with the State."

13. Page 8, paragraph 4, line 7:

See above comment.

14. Page 8, paragraph 5, line 3:

See above comment.

15. Page 9, paragraph 2, line 6:

See above comment.

16. Page 9, paragraph 3, line 2:

See above comment.

17. Page 9, paragraph 4, line 8, 14, 16:

Add (3 times) in the above mentioned lines after U.S. EPA:
and the State.

18. Page 10, paragraph 3, line 6:

See above comment.

19. Page 10, paragraph 3, end of line 6:

Add: "... U.S. EPA after consultation with the State
determines"

20. Page 10, paragraph 3, line 11:

Add after U.S. EPA: after consultation with the State.

21. Page 10, paragraph 4, line 3, 6:

See above comment. Add 2 times in the above mentioned
lines.

22. Page 11, paragraph 1, last line:

See above comment.

23. Page 11, paragraph 2, line 3 and line 10:

See above comment.

24. Page 11, paragraph 3, line 3:

See above comment.

25. Page 11, paragraph 4, line 2:

See above comment.

26. Page 12, paragraph 2, line 2:

See above comment.

27. Page 12, paragraph 3, line 13:

See above comment.

28. Page 12, paragraph 4, line 3:

See above comment.

29. Page 13, paragraph 1, line 9:

See above comment.

30. Page 13, paragraph 2, last line:

See above comment.

31. Page 14, paragraph 5, line 2:

Add after U.S. EPA: "and IDEM."

32. Page 15, paragraph 2, line 1:

See above comment.

33. Page 15, paragraph 3, line 4:

See above comment.

34. Page 15, paragraph 4, line 6:

Add after U.S. EPA: "after consultation with the State."

35. Page 15, paragraph 4, last line:

Add after U.S. EPA: "and IDEM"

36. Page 17, paragraph 1, line 4:

See above comment.

37. Page 18, paragraph 4, line 6 (prefinal inspection):

See above comment.

38. Page 19, paragraph 1, line 2:

Insert after U.S. EPA: "the State"

39. Page 20, paragraph 5, line 5:

Insert after U.S. EPA: "and IDEM"

40. Page 24, paragraph 2, line 2 and 3:

See previous comment. Insert 2 times in the above mentioned locations "and IDEM."

41. Page 27, #3, #4, #5:

Insert after U.S. EPA's: and the State's.

42. Page 27, #10:

The EPA's authorization to proceed is given after approval of plans (or contractor selection/approval). It may be unlikely that the construction is completed within 15 days after authorization.

Appendix A

43. Page 2, paragraph 1, line 3:

Shouldn't the treatment level for PCB be 1 ppm?

The comments regarding the model RD/RA Consent Decree will also be submitted.

If you have further questions regarding the above comments, please call me at (317) 243-5188.

Very truly yours,

Gabriele Hauer, Project Manager
Superfund Section
Office of Environmental Response

GH/cd